



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

APR 12 2016

Certified Mail

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Ms. Laura Pagano
Regulatory Program Manager, Wastewater
San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

RE: Follow up to April 8, 2016 Meeting Discussing Clean Water Act Section 308(a) Information Request, EPA Docket No. CWA 308-9-16-001

Dear Ms. Pagano:

Thank you again for meeting with us on April 8, 2016 to discuss the San Francisco Public Utilities Commission's (SFPUC) progress in responding to the Environmental Protection Agency's (EPA) February 16, 2016 Clean Water Act Request for Information (RFI). Based on your request and our subsequent conversation, we are revising certain due dates as follow:

Item 2 (historic excursions):

Provide a response for excursions from October 2, 2011 through March 30, 2016 by **April 30, 2016**.

Item 3 (excursions, spills, and private party backups):

Provide a report of spills, for February and March by **April 15, 2016**.

Provide monthly reports of excursions and private property backups for February and March by **April 30, 2016**.

Provide future monthly reports of spills for April, May, and June by the 10th day of the following month, **May 10, June 10, and July 10, 2016**, respectively.

Provide future monthly reports of excursions and private property backups for April, May and June by the 30th day of the following month, **May 30, June 30, and July 30, 2016**, respectively.

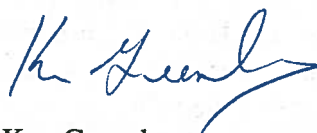
Based on our meeting, EPA understands that the SFPUC's current practice is to generate excursion reports based only on work orders in Maximo, the SFPUC's work order tracking system. We understood from your presentation that it is not the SFPUC's current practice to create work orders for excursions that occur during rain events if staff from the SFPUC conclude that there is not maintenance that can be done to relieve the excursion. As a result, the SFPUC does not track these excursions. We also now understand that it is the SFPUC's current practice

to respond to private property backups only if there is a concurrent spill from the four-inch vent in the sidewalk, and to create a work order if the SFPUC staff believes the backup was caused by an issue in the collection system that can be resolved through maintenance conducted by the SFPUC. As a result of these practices, SFPUC does not investigate private property backups to determine if they are caused by blockages or flow conditions in the portion of the combined sewer system operated by the SFPUC, such as private property backups caused by rain events that exceed the capacity of SFPUC sewer mains. Additionally, as explained during the meeting, the SFPUC currently does not estimate excursion volumes unless staff from the SFPUC observe an active excursion and generates a work order in Maximo related to the excursion. Thus, the SFPUC has not estimated or recorded volumes for the majority of excursions, including large volume excursions caused by rain events. Given these limitations, we understand that the SFPUC submittals will be a partial response to the RFI, based on the information available in Maximo. As stated at the meeting, EPA is still interested in a complete response to the RFI. In your responses to the RFI, SFPUC should indicate if the reported information is incomplete.

In the interest of working together to improve the SFPUC's excursion identification, estimation, and tracking practices, EPA and the SFPUC agreed to meet again in the next few weeks to discuss 1) mechanisms for the SFPUC to better track all excursions going forward, including those that occur during rain events, as well as those that occur on private property; 2) methodologies for the SFPUC to identify past unreported excursions that occurred during rain events and if identified to then correct its reporting; and 3) methodologies that can be implemented for volume estimations. Staff from EPA and the SFPUC are working to schedule that meeting.

As we discussed at the meeting, EPA looks forward to further discussions to better understand all operations of the sewer system in the next few months. If you have technical questions about EPA's RFI please contact Eric Magnan at 415-947-4179 or magnan.eric@epa.gov. Legal questions should be directed to Ellen Blake of the Office of Regional Counsel at 415-972-3496 or blake.ellen@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Greenberg", with a stylized flourish extending from the end.

Ken Greenberg
Manager, Water Section I
Enforcement Division

cc (via email): John Roddy, City and County of San Francisco
Lila Tang, San Francisco Bay Regional Water Quality Control Board
Jim Fischer, State Water Resources Control Board